

Clarification on CMS Guidance around Medicaid Attestations for Eligible

Hospitals

In light of recent guidance from CMS, the NC Medicaid EHR Incentive Program wants to provide all eligible hospitals (EH) with additional guidance around attesting for the NC Medicaid EHR Incentive Program.

In short, once an EH attests to Medicare, it will follow the Medicare reporting schedule for Medicaid attestation.

As made evident by the charts below, EHs that attest with Medicaid before Medicare may receive an incentive payment for adopting, implementing or upgrading (AIU), while EHs that attest with Medicare first must report on meaningful use (MU) in order to receive Medicaid payments.

Even if you've already attested to MU for Medicare, it is a simple process to submit your MU attestation for Medicaid.

1. Ensure dual eligibility applies for both the Medicare and Medicaid programs
2. Sign into the NC-MIPS Portal with your NCID
3. Confirm demographic information and enter cost report, patient volume, and contact information
4. Select MU on the attestation page, and key in the same reporting period used for the current year's Medicare attestation
5. Print, sign & send your attestation

That's it. There is no need to re-report the MU data you submitted to Medicare. It's that easy.

The tables below describe examples of scenarios hospitals may find themselves in. To preface, the tables are based on the assumption that after the EH attests once, it will be attesting to both programs each year.

***NOTE:** *The scenarios below are based on the assumption that an EH is dually eligible. After attesting to 90 days of MU with Medicare, EHs will always attest to 365 days of MU for each of their payment years thereafter. Even if the EH skips a year with Medicaid, it will still be required to attest to 365 days of MU.*

Scenario 1: *EH attests to Medicare 1st and then attests with Medicaid in 2014.*

	Payment Schedule (Based on FFY)
Attests with Medicare before Medicaid in same year	<p>In 2014: 1st payment year For Medicare & Medicaid – attest to 90 days of MU</p> <p>In 2015 & beyond: For Medicare & Medicaid – will attest to 365 days of MU</p>

For Medicaid Participation: Attest to 90 days of MU for the first payment year, then attest to 365 days of MU for each of the following payment years (payment years 1, 2, and 3).

Further explanation: If the EH first attested with Medicare, and would like to attest with Medicaid in the same year, the EH will follow the Medicare reporting requirements when attesting with Medicaid.

This means, if the EH reported 90 days of MU with Medicare in 2014, it will report 90 days of MU in 2014 with Medicaid as well – even if 2014 is its first payment year with the Medicaid EHR Incentive Program. Furthermore, after its first year of participation, the EH will attest to 365 days of MU for every additional year it participates (payment years 2 and 3).

In other words, if the EH attests with Medicare first, the EH will NOT attest to AIU for the Medicaid program.

Scenario 2: *EH attests with Medicaid 1st and then attests with Medicare in 2014.*

	Payment Schedule (Based of FFY)
Attested to Medicaid before Medicare in same year	<p>In 2014: For Medicaid – attests to AIU For Medicare – attests to 90 days of MU</p> <p>In 2015 & beyond: For Medicaid & Medicare – attest to 365 days of MU</p>

For Medicaid Participation: Attest to AIU the first payment year, then attest to 365 days of MU for each of the following payment years (payment years 2 and 3).

Further explanation: If the EH reports with Medicaid first in 2014 and would like to attest with Medicare in the same year, the EH will attest to AIU during its first payment year in the NC Medicaid EHR Incentive Program, and will attest to 90 days of MU with Medicare.

Because Medicare requires an EH to attest to 90 days of MU during its first payment year, when the EH comes back to attest with Medicaid (in payment years 2 and 3), it will be attesting to 365 days of MU for both Medicaid & Medicare. The EH will NOT attest to 90 days of MU with Medicaid.

Scenario 3: *EH attested with Medicare in 2013 and wishes to attest with Medicaid for the first time in 2014*

	Payment Schedule (Based on FFY)
Attested with Medicare in 2013, and then attested to Medicaid in 2014	<p>In 2013: 1st payment year For Medicare – attested to 90 days of MU</p> <p>In 2014 & beyond: For Medicare & Medicaid – will attest to 365 days of MU</p>



For Medicaid Participation: Attest to 365 days of MU for the first payment year and beyond (payment years 1, 2, and 3).

Further Explanation: If the EH successfully attested with Medicare in 2013 and waits until 2014 to attest with Medicaid for the first time, they will be required to attest to 365 days of MU with Medicaid.

In other words, if the EH attests with Medicaid a year after attesting with Medicare, they will NOT attest to AIU or 90 days MU with Medicaid. Instead, it will attest to 365 days of MU for every year of its participation in the Medicaid Incentive Program (payment years 1, 2, and 3).

Scenario 4: *EH attested with Medicaid in 2013, and then attests with Medicare for the first time in 2014.*

	Payment Schedule (Based on FFY)
Attested with Medicaid in 2013, and then attests with Medicare in 2014	<p>In 2013: 1st payment year For Medicaid – attested to AIU</p> <p>In 2014: For Medicare & Medicaid - will attest to 90 days of MU</p> <p>In 2015: For Medicare & Medicaid – will attest to 365 days of MU</p>

For Medicaid Participation: Attest to AIU in the first payment year, attest to 90 days of MU in the second payment year, and attest to 365 days of MU in the third payment year.

Further Explanation: If the EH attested with Medicaid in 2013 and waits until 2014 to attest with Medicare, it attested to AIU for its first payment year with the NC Medicaid EHR Incentive Program. When the EH comes back to attest for its second payment year with Medicaid in 2014, it will attest to 90 days of MU. When the EH comes back to attest with Medicaid, it will attest to 365 days of MU.

EHR incentives are readily available. Sign up for the NC Medicaid EHR Incentive Program today!

If you have any questions, please do not hesitate to contact us. We are here to help you through the process, and look forward to working with you soon.